

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

PREMIER CAPITAL, LLC,)
)
Plaintiff,)
)
v.)
)
BEVERLY JOHNSON PENZELL, d/b/a)
Law Office of Kris E. Penzell;)
and BEVERLY JOHNSON PENZELL, as)
Personal Representative of the)
Estate of Kris E. Penzell,)
SUSAN I. NOE, and VICTOR K.)
RONES,)
)
Defendants.)

Civil Action No.
03-CV-12497-NG

PLAINTIFF'S ASSENTED-TO MOTION TO
CONTINUE MEDIATION DATE

Plaintiff Premier Capital, LLC ("Premier"), by its attorney, makes this assented-to motion to continue the date of the mediation in the above action, currently scheduled for June 20, 2006.

As grounds, Premier states that its counsel is scheduled to begin an out-of-town vacation on June 16, and a continuance will therefore enable Premier to properly prepare for, and for its sole attorney herein to attend, the mediation session. Counsel for defendants assent to the allowance of this motion. This is the first such motion plaintiff has made.

WHEREFORE, Premier requests that the Court allow its Motion to Continue. Counsel for all parties join to request a new mediation date between July 17, 2006 and August 17, 2006.

PREMIER CAPITAL, LLC

By its attorney,

Thomas James Morrissey/ks
Thomas James Morrissey

BBO# 547077

164 Strathmore Rd., Suite 25
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Brookline, MA 02446

Tel.: (617) 787-3434

Dated: June 12, 2006

CERTIFICATE OF SERVICE

The undersigned, counsel for the plaintiff Premier Capital, Inc., certify that I served a copy of the foregoing Motion upon counsel of record for defendant Beverly Johnson Penzell, Posternak, Blankstein & Lund, L.L.P., Prudential Tower, 800 Boylston Street, Boston, Massachusetts 02199-8004, and Steven A. Sussman, Esq., 6 Beacon Street, Suite 400, Boston, MA 02108 by facsimile transmission this 12th day of June, 2006.

Thomas James Morrissey/ks
Thomas James Morrissey
BBO# 547077